

Exhibit A

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

CORNELIUS HILL
and
TRUDIE HASTINGS HILL, H/W
Plaintiffs,

v.

SCHIFFFAHRTSGESELLSCHAFT
MS PRIWALL mbH & CO. KG
and
N.B. NIEDERELBE SCHIFFFAHRTSFES.
mbH & CO.
and
F. LAEISZ SCHIFFFAHRTSGES.mBH & CO.
and
CROWLEY AMERICAN TRANSPORT
Defendants.

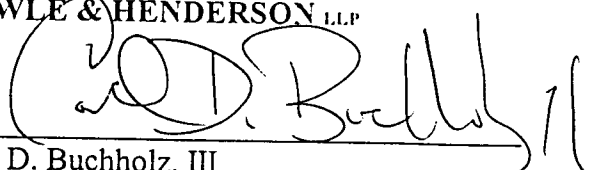
NO. 02-CV-2713

OFFER OF JUDGMENT

Pursuant to Fed. R.Civ.P. 68, defendants Schiffahrtsgesellschaft MS Priwall mbH & Co. KG, F. Laeisz Schiffahrtsges.mBH & Co. and Crowley American Transport hereby offer judgment in favor of plaintiff for fifty thousand dollars (\$50,000.00), and against the foregoing defendants in the above-captioned matter. This offer shall remain in effect for ten days (10) from the date of service herein.

Respectfully submitted,

RAWLE & HENDERSON LLP

By: 
Carl D. Buchholz, III
Attorney for Defendants

Dated: 12/19/02

0759671.01

Exhibit B

RESLIN SPECIALIZED SERVICES**Invoice**

P.O. BOX 325
 UPPER DARBY, PA 19082
 610-734-1647 Phila. Only 215-747-7747
 FAX 610-734-2192

Date	Invoice #
2/11/2004	27470

Bill To
DAVID S. SANTEE, ESQUIRE RAWLE & HENDERSON THE WIDENER BUILDING ONE SOUTH PENN SQUARE PHILADELPHIA, PA 19107

YOUR FILE NO.	435-288
CASE NO.	USDC # 02-CV-2713
CAPTION	HILL v F. LAEISZ

Description	Amount
SUBPOENA SERVED UPON DWIGHT JONES, 2041 BEECHWOOD STREET, PHILA.,PA. 2-10-04 JONES IS A LONGSHOREMAN, SPOKE TO HIM VIA TELEPHONE ON 2-5-04, HE WAS TO CONTACT SERVER AND ADVISE WHEN HOME. HE DID NOT CALL. HE ATTEMPTED TO AVOID SERVICE ON 2-10-04.	45.00

TAX I.D. # 23-2455957

Total	\$45.00
--------------	----------------

LATE FEE 1.5% INTEREST PER MONTH IF NOT PAID WITHIN 30 DAYS

TERMS NET 30 DAYS

SPECIALIZED SERVICES

Invoice

Date	Invoice #
2/25/2004	27529

YOUR FILE NO.

435 288

CASE NO.

USDC # 02 cv 2713

CAPTION

HILL v LAEISZ

Bill To

DAVID S. SANTEE, ESQUIRE
 RAWLE & HENDERSON
 THE WIDENER BUILDING
 ONE SOUTH PENN SQUARE
 PHILADELPHIA, PA 19107

Description	Amount
SUBPOENAS SERVED UPON MR. VAGN EJSING, DELAWARE RIVER STEVEDORES, 441 NORTH 5TH STREET, PHILA.,PA. 2-23-04 BY HANDING TO STEPHANIE FLANDERS @ 12:45 PM	45.00
SUBPOENA SERVED UPON DWIGHT JONES, 2041 BEECHWOOD STREET, PHILA.,PA. 2-23-04 BY HANDING TO HIS WIFE @ 1:30 PM	45.00

TAX I.D. # 23-2455957

Total**\$90.00**

LATE FEE 1.5% INTEREST PER MONTH IF NOT PAID WITHIN 30 DAYS

TERMS NET 30 DAYS

435288

SPECIALIZED SERVICES

Invoice

DARBY, PA 19082
610-734-1647 Phila. Only 215-747-7747
FAX 610-734-2192

Date	Invoice #
2/18/2004	27507

Bill To
DAVID S. SANTEE, ESQUIRE RAWLE & HENDERSON THE WIDENER BUILDING ONE SOUTH PENN SQUARE PHILADELPHIA, PA 19107

YOUR FILE NO.	435,288
CASE NO.	USDC ED OF PA # 02-CV-2713
CAPTION	HILL v LAEISZ

Description	Amount			
SUBPOENA SERVED UPON ROBERT FINE, ESQUIRE, 1333 RACE STREET, PHILA.,PA. 2-18-04 - PERSONAL IN HAND @ 11:01 AM RUSH SAME DAY SERVICE	55.00			
<table><tr><td>TAX I.D. # 23-2455957</td><td>Total</td><td>\$55.00</td></tr></table>		TAX I.D. # 23-2455957	Total	\$55.00
TAX I.D. # 23-2455957	Total	\$55.00		

LATE FEE 1.5% INTEREST PER MONTH IF NOT PAID WITHIN 30 DAYS

TERMS NET 30 DAYS

IN SPECIALIZED SERVICES

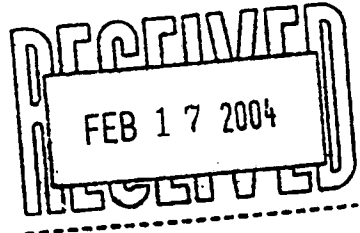
Invoice

8325
 DARBY, PA 19082
 610-734-1647 Phila. Only 215-747-7747
 FAX 610-734-2192

Date	Invoice #
2/13/2004	27488

Bill To
DAVID S. SANTEE, ESQUIRE RAWLE & HENDERSON THE WIDENER BUILDING ONE SOUTH PENN SQUARE PHILADELPHIA, PA 19107

YOUR FILE NO.	435,288
CASE NO.	USDC # 02-CV-2713
CAPTION	HILL v F. LAEISZ

Description	Amount
SUBPOENA SERVED UPON BENEFIT PROCESSING, 20 BRACE ROAD, SUITE 114, CHERRY HILL, NEW JERSEY 2-12-04 BY HANDING TO AMY TRIMBUR @ 1:15 PM	68.50
TOLLS	3.00
	

TAX I.D. # 23-2455957

Total**\$71.50**

LATE FEE 1.5% INTEREST PER MONTH IF NOT PAID WITHIN 30 DAYS

TERMS NET 30 DAYS

ESLIN SPECIALIZED SERVICES

Invoice

BOX 325
UPPER DARBY, PA 19082
610-734-1647 Phila. Only 215-747-7747
FAX 610-734-2192

Date	Invoice #
3/12/2004	27588

Bill To
DAVID S. SANTEE, ESQUIRE RAWLE & HENDERSON THE WIDENER BUILDING ONE SOUTH PENN SQUARE PHILADELPHIA, PA 19107

YOUR FILE NO.	435-288
CASE NO.	USDC # 02-CV-2713
CAPTION	HILL v F. LAEISZ

Description	Amount
SUBPOENA SERVED UPON MR. VAGN EJSING, DELAWARE VALLEY STEVEDORES, 441 N. 5TH STREET, PHILA.,PA. 3-8-04 BY HANDING TO STEPHANIE FLANDERS @ 12:17 PM	45.00
SUBPOENA SERVED UPON DWIGHT JONES, 2041 BEECHWOOD STREET, PHILA.,PA. 3-8-04 - PERSONAL IN HAND @ 12:39 PM	45.00
<div> <div>TAX I.D. # 23-2455957</div> <div> Total <div>\$90.00</div> </div> </div>	

LATE FEE 1.5% INTEREST PER MONTH IF NOT PAID WITHIN 30 DAYS

TERMS NET 30 DAYS

RESLIN SPECIALIZED SERVICES

Invoice

P.O. BOX 325

UPPER DARBY, PA 19082

610-734-1647 Phila. Only 215-747-7747

FAX 610-734-2192

Date	Invoice #
3/29/2004	27643

Bill To
DAVID S. SANTEE, ESQUIRE RAWLE & HENDERSON THE WIDENER BUILDING ONE SOUTH PENN SQUARE PHILADELPHIA, PA 19107

YOUR FILE NO.

435, 288

CASE NO.

USDC ED OF PA # 02 CV 2713

CAPTION

HILL v LAEISZ

Description	Amount
SUBPOENA SERVED UPON DWIGHT JONES, 2041 BEECHWOOD STREET, PHILA.,PA. 3-25-04 - PERSONAL @ 2:25 PM	45.00
Total	
\$45.00	

TAX I.D. # 23-2455957

LATE FEE 1.5% INTEREST PER MONTH IF NOT PAID WITHIN 30 DAYS

TERMS NET 30 DAYS

Exhibit C

ZANARAS REPORTING & VIDEO
1616 Walnut St., Ste. 300 Phila., PA 19103
(215) 790-7857 Fax: (215) 731-0759
2112 Bay Ave., Ocean City, NJ 08226
(609) 398-6349 Fax (609) 398-2833
Federal I.D. #52-2005201

CHARLES MCCAMMON, ESQUIRE
RAWLE & HENDERSON
THE WIDENER BLDG, 16TH FLOOR
ONE SOUTH PENN SQUARE
PHILADELPHIA, PA 19107
(215) 575-4200

November 15, 2002

Invoice# 4770

Balance: \$480.70

Caption: HILL V. CROWLEY

Scheduled: 10/23/02 Billed: 10/28/02
Reporter: CHERYL STRINGER

I n v o i c i n g I n f o r m a t i o n

<u>Charge Description</u>	<u>Amount</u>
ORIG. & 1 COPY - REGULAR	475.70
DEPOSITION OF: CORNELIUS HILL	
PACKAGING & DELIVERY	5.00

1.50% per month on unpaid balance

Please Remit - - - > Total Due: \$480.70

Thank you for using Julie Zanaras Reporting
Please remit checks within 30 days

435.288

bills

ESQUIRE DEPOSITION SERVICES, LLC

A Hobart West Company

1880 John F Kennedy Blvd. 15th Floor

Philadelphia, PA 19103

(215)988-9191 FAX(215)988-9089

Tax ID # 22-3779684

TO : RAWLE & HENDERSON
 THE WIDENER BUILDING 16TH FLOOR
 1339 CHESTNUT STREET
 PHILADELPHIA PA 19107

DATE : 12/17/02
 (RAWLH01)

PAGE : 1

FAX:

 S T A T E M E N T

INV #	INV DATE	CAPTION	REFERENCE	DT TAKEN	INV AMT CR	AMT PAID	BAL DUE
99130	11/13/02	HILL VS. CRAWLEY AMERICAN TRANSPORTATIO	CHARLES MCCAMMON, ES	10/24/02	140.35	0.00	140.35

For Statement Questions, Please call
 (866)377-5962 Fax (973)377-9543

BALANCE DUE

140.35

OVER 30 DAYS

140.35

TERMS: DUE UPON RECEIPT

We accept VISA, MasterCard & American Express cards

Remit to: ESQUIRE DEPOSITION SERVICES, LLC
 P.O. BOX 17606
 BALTIMORE, MD 21297-1606

JANARAS REPORTING & VIDEO
1616 Walnut St., Ste. 300 Phila., PA 19103
(215) 790-7857 Fax: (215) 731-0759
2112 Bay Ave., Ocean City, NJ 08226
(609) 398-6349 Fax (609) 398-2833
Federal I.D. #52-2005201

435288
Bills/Rec'd
J. L. J.

CHARLES MCCAMMON, ESQUIRE
RAWLE & HENDERSON
THE WIDENER BLDG, 16TH FLOOR
ONE SOUTH PENN SQUARE
PHILADELPHIA, PA 19107
(215) 575-4200

January 23, 2003

Invoice# 5473

Balance: \$654.50

Caption: HILL V. SEA PARTNER

Scheduled: 01/11/03 Billed: 01/15/03
Reporter: APRIL J WILLIS

I n v o i c i n g I n f o r m a t i o n

<u>Charge Description</u>	<u>Amount</u>
COPY - REGULAR	543.90
DEPOSITION OF: WICLEF SCHUESSLER	
ATTENDANCE OF REPORTER (SATURDAY)	100.00
EXHIBITS COPIED	5.60
PACKAGING & DELIVERY	5.00

1.50% per month on unpaid balance

P l e a s e R e m i t - - - > Total Due: \$654.50

Thank you for using Julie Zanaras Reporting
Please remit checks within 30 days

OK
C.D.B.

ZANARAS REPORTING & VIDEO
 1616 Walnut St., Ste. 300 Phila., PA 19103
 (215) 790-7857 Fax: (215) 731-0759
 2112 Bay Ave., Ocean City, NJ 08226
 (609) 398-6349 Fax (609) 398-2833
 Federal I.D. #52-2005201

11 Bills/line
 golds
 435288

CARL BUCHHOLZ, ESQUIRE/ANN
 RAWLE & HENDERSON
 THE WIDENER BLDG, 16TH FLOOR
 ONE SOUTH PENN SQUARE
 PHILADELPHIA, PA 19107
 (215) 575-4200

March 4, 2004

Invoice# 8373

Balance: \$766.60

Caption: HILL VS. SCHIFFFAHRTSGESELLSCHAFT
 VIDEO

Scheduled: 02/24/04 Billed: 03/04/04
 Reporter: JULIE M. ZANARAS

I n v o i c i n g I n f o r m a t i o n

<u>Charge Description</u>	<u>Amount</u>
ORIG. & 1 COPY - MEDICAL	399.60
DEPOSITION OF: RICHARD J. MANDELL, MD	295.00
VIDEOTAPE DEPOSITION - 2 HRS.	60.00
ATTENDANCE OF REPORTER (FLOURTOWN, PA)	7.00
EXHIBITS COPIED	5.00
PACKAGING & DELIVERY	
NO CHARGE FOR MINI/ASCII	

1.50% per month on unpaid balance

Please Remit - - - > Total Due: \$766.60

Thank you for using Julie Zanaras Reporting
 Please remit checks within 30 days

OK
 CDB
 766.60

ZANARAS REPORTING & VIDEO
1616 Walnut St., Ste. 300 Phila., PA 19103
(215) 790-7857 Fax: (215) 731-0759
2112 Bay Ave., Ocean City, NJ 08226
(609) 398-6349 Fax (609) 398-2833
Federal I.D. #52-2005201

Bills/lu
fdh
435,288

CARL BUCHHOLZ, ESQUIRE/ANN
RAWLE & HENDERSON
THE WIDENER BLDG, 16TH FLOOR
ONE SOUTH PENN SQUARE
PHILADELPHIA, PA 19107
(215) 575-4200

March 31, 2004

Invoice# 8337

Balance: \$176.10

Caption: HILL VS PRIWALL

Scheduled: 02/16/04 Billed: 02/27/04
Reporter: JULIE M. ZANARAS

I n v o i c i n g I n f o r m a t i o n

<u>Charge Description</u>	<u>Amount</u>
ORIG. & 1 COPY - REGULAR	171.10
DEPOSITION OF: TRUDIE HASTINGS HILL	
PACKAGING & DELIVERY	5.00
NO CHARGE FOR MINI/ASCII	

1.50% per month on unpaid balance

P l e a s e R e m i t - - - > Total Due: \$176.10

Thank you for using Julie Zanaras Reporting
Please remit checks within 30 days

OK
CDB
0176.10

DATE	INVOICE NO. OR REFERENCE	AMOUNT	DISCOUNT	BALANCE
01/29/03	5381 TRANSCRIPT 435288	255.55		255.55 <i>gm</i>
Charles W. McCar		TOTALS	255.55 0.00	255.55

PLEASE DETACH STATEMENT BEFORE DEPOSITING CHECK

68064

RAWLE & HENDERSON LLP

DATE
01/29/03

CHECK NO.

68064

SOVEREIGN BANK

60-7269
2313

PAY EXACTLY TWO HUNDRED FIFTY FIVE AND 55/100 DOLLARS

AMOUNT PAID
*****255.55ZANARAS COURT REPORTING
ORDER OF
1616 WALNUT ST.
STE. 300
Philadelphia PA 19103*Theodore O Viri*

⑈068064⑈ ⑆231372691⑆

21110111111⑈

AUTHORIZED SIGNATURE

ZANARAS REPORTING & VIDEO
1616 Walnut St., Ste. 300 Phila., PA 19103
(215) 790-7857 Fax: (215) 731-0759
2112 Bay Ave., Ocean City, NJ 08226
(609) 398-6349 Fax (609) 398-2833
Federal I.D. #52-2005201

"Bills/Ku"
folder
435,288

CARL BUCHHOLZ, ESQUIRE/ANN
RAWLE & HENDERSON
THE WIDENER BLDG, 16TH FLOOR
ONE SOUTH PENN SQUARE
PHILADELPHIA, PA 19107
(215) 575-4200

March 31, 2004

Invoice# 8339

Balance: \$80.90

Caption: HILL V. PRIWALL

Scheduled: 02/17/04 Billed: 02/29/04
Reporter: APRIL J FOGA

I n v o i c i n g I n f o r m a t i o n

<u>Charge Description</u>	<u>Amount</u>
ORIG. & 1 COPY - REGULAR	75.90
DEPOSITION OF: DWIGHT JONES	
PACKAGING & DELIVERY	5.00
NO CHARGE FOR MINI/ASCII	

1.50% per month on unpaid balance

P l e a s e R e m i t - - - > Total Due: \$80.90

Thank you for using Julie Zanaras Reporting
Please remit checks within 30 days

OK
CDB
\$80.90

CAPITAL LEGAL SERVICES

1431 Lombard Street
 Philadelphia, PA 19146
 (800) 760-2626 toll free
 (215) 732-4888 fax

INVOICE

DATE	INVOICE NO.
2/25/2004	021104CB156

Bill To :

Carl Buchhoiz, III, Esquire
 Rawle & Henderson
 The Widener Building
 One South Penn Square
 Philadelphia, PA 19107

Case Caption :

Cornelius Hill vs. Priwall, et al
See Parth

Date Taken	Terms	Payment Due
02/11/04	Due on receipt	2/25/2004

Item	Description	Number of Pages
Copy	Deponent(s): Dr. Collier	156
S & H	Shipping and Handling	1
Credit Cards	Visa# _____ MasterCard# _____ American Express# _____ Expiration Date: _____ Card Holders Name _____ Signature: _____ Billing Address for Card Holder: _____ _____	
Federal Tax ID No: 72-1519320 - THANK YOU!!!! 1.5% Finance charge on all balances over 30 day.		Total \$407.80

OK
CDB - Cornelius Hill file

Exhibit D

RAWLE & HENDERSON LLP



CARL D. BUCHHOLZ, III
215-575-4235
cbuchholz@rawle.com

DAVID S. SANTEE
215-575-4271
dsantee@rawle.com

THE NATION'S OLDEST LAW OFFICES
ESTABLISHED 1783
www.rawle.com

THE WIDENER BUILDING
ONE SOUTH PENN SQUARE
PHILADELPHIA, PA 19107

TELEPHONE: (215) 575-4200
FACSIMILE: (215) 563-2583

April 7, 2004

Mr. Dwight Jones
2041 Beechwood Street
Philadelphia, PA 19145

Re: M/V SEA PANTHER
Cornelius Hill, L/S
At: Tioga Marine Terminal, Port of Philadelphia
d/o/I: August 24, 2000
Civil Action No. 02-2731
Our File No. 435,288

Dear Mr. Jones:

Enclosed please find our draft No. 87439 in the amount of \$216.00 for reimbursement of one day's pay that you lost due to your attendance at a deposition in our offices in the above-referenced matter.

Very truly yours,

RAWLE & HENDERSON LLP

By: *David S. Santee*
Carl D. Buchholz, III
David S. Santee

CDB/DSS:cct
Enclosure

HENDERSON LLP

DATE	INVOICE NO, OR REFERENCE	AMOUNT	DISCOUNT	BALANCE
02/04	21600-44023440233 WITNESS FEE	216.00		216.00
DAVID S SANTEE	TOTALS	216.00	0.00	216.00

10/2/04

30
3

RAWLE & HENDERSON LLP

DATE	INVOICE NO. OR REFERENCE	AMOUNT	DISCOUNT	BALANCE
02/19/04	4000-435288 WITNESS FEE 435288	40.00		40.00
Kimberly A. Bred TOTALS		40.00	0.00	40.00

PLEASE DETACH STATEMENT BEFORE DEPOSITING CHECK

85188

RAWLE & HENDERSON LLP



DAVID S. SANTEE
215-575-4271
dsantee@rawle.com

THE NATION'S OLDEST LAW OFFICES
ESTABLISHED 1783
www.rawle.com

THE WIDENER BUILDING
ONE SOUTH PENN SQUARE
PHILADELPHIA, PA 19107

TELEPHONE: (215) 575-4200
FACSIMILE: (215) 563-2583

February 20, 2004

Mr. Dwight Jones
2041 Beechwood Street
Philadelphia, PA 19145

Re: Cornelius Hill v. Crowley American Transport
Our File No. 435,288

Dear Mr. Jones:

Attached please find a subpoena requiring your appearance for testifying in the above matter. Also enclosed is a witness fee in the amount of \$40.00.

As stated on the subpoena, please contact me prior to March 1, 2004 in case there is a change in the date and time of this trial.

Thank you for your continuing cooperation in this matter.

Very truly yours,

RAWLE & HENDERSON LLP

By: David S. Santee
David S. Santee

DSS/kb
Encl.

RAWLE HENDERSON LLP

DATE	INVOICE NO. OR REFERENCE	AMOUNT	DISCOUNT	BALANCE
02/19/04	4000-435288WITNESS FEE	40.00		40.00
Kimberly A. Breech TOTALS		40.00	0.00	40.00

PLEASE DETACH STATEMENT BEFORE DEPOSITING CHECK

85187

RAWLE & HENDERSON LLP



DAVID S. SANTEE
215-575-4271
dsantee@rawle.com

THE NATION'S OLDEST LAW OFFICES
ESTABLISHED 1783
www.rawle.com

THE WIDENER BUILDING
ONE SOUTH PENN SQUARE
PHILADELPHIA, PA 19107

TELEPHONE: (215) 575-4200
FACSIMILE: (215) 563-2583

February 20, 2004

Mr. Vagn Ejsing
Delaware River Stevedores
4401 N. 5th Street, Suite 101
Philadelphia, PA 19123

Re: Cornelius Hill v. Crowley American Transport
Our File No. 435,288

Dear Mr. Ejsing:

Attached please find a subpoena requiring your appearance for testifying in the above matter. Also enclosed is a witness fee in the amount of \$40.00.

As stated on the subpoena, please contact me prior to March 1, 2004 in case there is a change in the date and time of this trial.

Thank you for your continuing cooperation in this matter.

Very truly yours,

RAWLE & HENDERSON LLP

By: David S. Santee
David S. Santee

DSS/kb
Encl.

RAWLE & HENDERSON LLP

DATE INVOICE NO. OR REFERENCE AMOUNT DISCOUNT BALANCE

01/26/04 4000-435288 WITNESS FEE 40.00 40.00

435288

Kimberly A. Bree

TOTALS



40.00

0.00

40.00

PLEASE DETACH STATEMENT BEFORE DEPOSITING CHECK

83976

RAWLE & HENDERSON LLP



DAVID S. SANTEE
215-575-4271
dsantee@rawle.com

THE NATION'S OLDEST LAW OFFICES
ESTABLISHED 1783
www.rawle.com

THE WIDENER BUILDING
ONE SOUTH PENN SQUARE
PHILADELPHIA, PA 19107

TELEPHONE: (215) 575-4200
FACSIMILE: (215) 563-2583

January 30, 2004

Mr. Dwight Jones
2041 Beechwood Street
Philadelphia, PA 19145

Re: Cornelius Hill v. Crowley American Transport
Our File No. 435,288

Dear Mr. Jones:

Please be advised that we have scheduled the continuation of your deposition for Tuesday, February 17, 2004, commencing at 10:00 a.m. in our offices. I have enclosed a witness fee in the amount of \$40.00.

Please contact me upon receipt of this letter to confirm your availability. Thank you for your anticipated cooperation in this matter.

Very truly yours,

RAWLE & HENDERSON LLP

By: David Santee

David S. Santee

DSS/kb
Encl.

WFC ASSOCIATES LLC

**1716 PEARTREE LANE
CROFTON, MD 21114
TEL: 410-721-3799
FAX: 410-451-5286
CELL: 302-542-9887**

435,288
: ag

March 8, 2004

Carl D. Buchholz III
RAWLE & HENDERSON LLP
The Widener Building
One South Penn Square
Philadelphia, PA, 19107

RE: CORNELIUS HILL CASE-FINAL INVOICE

Dear Mr. Buchholz:

Enclosed please find my invoice No. 0404W-02 in the amount of \$3639.75 for services rendered in the Cornelius Hill Case. This closes out this case and is my final billing.

Please make payment to WFC ASSOCIATES LLC. My EIN No. is 331-015-606.

Thank you for utilizing my services. I've enjoyed working with you and look forward to meeting with you on other cases in the future.

Best regards,


Walter F. Curran

WFC ASSOCIATES LLC

1716 PEARTREE LANE
CROFTON, MD 21114
TEL: 410-721-3799
FAX: - 410-451-5286
CELL: 302-542-9887

April 8, 2004

BILL TO: Carl D. Buchholz III
RAWLE & HENDERSON LLP
The Widener Building
One South Penn Square
Philadelphia, PA, 19107

Bill's/nc
felds
435288

INVOICE NO: 0404W-02

Consultant Services in the case of Cornelius Hill for the period 2/9/04 through 4/8/04

WORK LOG

Monday 2/9/04 No charge
Received email request from David Santee seeking the telephone number of Dwight Jones. I responded affirmatively by email.

Tuesday 2/17/04 1330-1430 1 hour 0 minutes
Received and sent various emails to David Santee regarding the relative status of Cornelius Hill and Dwight Jones vis-à-vis the position of Gang Foreman and relative wage rates. I reviewed the work records of the individuals going back as far as 5/1/03.
David informed me that the trial is tentatively scheduled to begin on 3/3/04.

Monday 3/1/04 No charge
David Santee informed me via telcon that the trial is postponed until 3/29/04. I will be available to testify on both 3/31/04 and 4/1/04.

Wednesday 3/3/04 No charge
Received an email request from David Santee looking for the updated addresses of William Zolinas and Daniel Ward. I emailed them to him.

Tuesday 4/6/04 1800-1900 1 hour 0 minutes
Met with Carl Buchholz and David Santee and reviewed the aspects of my testimony scheduled for Wednesday 4/7/04.

WORK LOG (continued)

Wednesday 4/7/04 1300-1700 (minimum charge) 8 hours 0 minutes
Testified in the capacity of an expert witness in the Cornelius Hill Case in Federal Court
(Courtroom 17 B).

Thursday 4/8/04 0900-1030 (Minimum charge) 8 hours 0 minutes
Testified in the capacity of an expert witness in the Cornelius Hill case in Federal Court.
(Courtroom 17 B).

WORK TIME

18 Hours worked at \$200.00 per hour \$3600.00

EXPENSES

Parking Fee 4/6/04	\$14.25	
Parking Fee 4/7/04	\$14.50	
Parking Fee 4/8/04	\$11.00	
Total Expenses		\$39.75

TOTAL \$3639.75

This represents the final billing in this case.

OK
CDB
Sea Panther

WEC ASSOCIATES LLC

**1716 PEARTREE LANE -
CROFTON, MD 21114
TEL: 410-721-3799
FAX: 410-451-5286
CELL: 302-542-9887**

INVOICE NO.: 0305W-03
INVOICE DATE: May 5, 2003

M/V 594
PANTHER

"Bills/Kel"
folks

435288

BILL TO:

RAWLE & HENDERSON LLP
The Widener Building
One South Penn square
Philadelphia, PA, 19107
Carl Buchholz III, Esq.

**REF: CONSULTANT SERVICES-JANUARY 23-APRIL 30, 2003
CORNELIUS HILL CASE**

General consultation in connection with vessel configuration, Stevedoring operations, Safety during vessel loading/discharging operations etc.

WORK LOG - CORNELIUS HILL CASE

Thursday 1/23/03 1900-2100 2 hours 0 minutes

Received a letter from Carl Buchholz confirming my appointment as an Expert Witness to the Hill Case. Enclosed with the letter were the deposition of Cornelius Hill and Dwight Jones and four (4) photos of lashing gear. I commenced reviewing them.

Sunday 2/2/03 1800-2000 2 hours 0 minutes

Completed review of the depositions and made notes pending further discussion with Carl Buchholz.

Wednesday 4/9/03 1000-1030, 1800-2300 5 hours 30 minutes
Received copies of depositions of Capt. Schuessler, Mr. Vagn Ejsing and David Burke As well as a copy of Capt. Ahlstrom's Expert opinion and reviewed them. Requested from C. Ahlstrom that he send some exhibits of Capt. Schuessler's deposition that were missing.

Thursday 4/10/03 1000-1200, 1900-2000 2 hours 0 minutes
Received and reviewed them.

OK
DB

WORK LOG - CORNELIUS HILL CASE

Sunday 4/13/03 2030-0200 5 hours 30 minutes
Reviewed depositions and experts opinion and began draft of my expert opinion.

Tuesday 4/15/03 2100-2400 3 hours 0 minutes
Completed initial draft of Expert opinion and reviewed talking points for Mr. McCammon.

Wednesday 4/16/03 1230 No charge
Emailed Mr. McCammon and informed him of the completion of my review and that I had done the initial draft of the Opinion.

Thursday 4/24/03 0600-0715, 0730-0800, 1100-1200 2 hours 45 minutes
Met with C. McCammon and the video photographer aboard the Consumer Princess berthed at GLT. Supervised the filming of the discharge of one (1) 20' foot container from on deck at #3 hatch and also filmed the proper way to insert and remove a lashing rod from a container (rod filming billed to Mankus case). Reviewed the draft of my Expert Opinion report and had a general discussion about the case with Mr. McCammon. Finalized the Expert Opinion report and sent it to Mr. Buchholz Friday morning 4/25/03.

Total	22 hours -45 minutes	@\$200.00 per hour	\$4550.00
-------	----------------------	--------------------	-----------

TOTAL INVOICE \$4550.00

RICHARD J. MANDEL, MD PC
ORTHOPAEDIC SPECIALISTS

RICHARD J. MANDEL, MD
DENNIS P. MCHUGH, DO

Arthroscopic Surgery • Hand & Shoulder Surgery • Sports Medicine • Joint Replacement • Occupational Orthopaedics

November 5, 2003

Attn: Carl Buchholz, Esq.
Rawle & Henderson LLP
The Widener Building
One South Penn Square
Philadelphia, PA 19107

Re: Cornelius Hill

Dear Mr. Buchholz:

The above referenced case has been re-scheduled for a Video Deposition on:

Deposition Date:	Tuesday, January 6, 2004
Pre-deposition Time:	2:30 PM
Deposition Time:	3:00 PM
Location:	

Flourtown Commons
1811 Bethlehem Pike, Suite 214
Flourtown, PA 19031

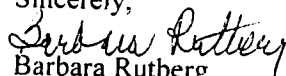
PAYMENT FOR THIS DEPOSITION IS DUE 30 DAYS PRIOR TO THE SCHEDULED TIME AND WILL GUARANTEE THIS APPOINTMENT FOR YOUR CLIENT. IF PAYMENT IS NOT RECEIVED, THE TIME WILL BE RELEASED FOR OTHER PATIENTS.

OUR OFFICE DEPOSITION CANCELLATION POLICY IS AS FOLLOWS: Depositions which are cancelled 30 calendar days to 5 calendar days prior to the scheduled deposition will incur a cancellation charge of 50% of the total fee. Depositions which are cancelled less than 5 calendar days from the scheduled date will incur a cancellation charge of 100% of the total fee. The fee for an oral deposition is \$3,250.00; Video Depositions are \$3,500.00. Depositions are allotted 2 hours, one half-hour preparation and one and one half-hours for deposition. There will be an additional fee of \$600 for every 30 minutes any deposition extends beyond the 2-hour limit.

Please note the attached bill for the cancelled deposition of 11/13/03 and the unpaid IME of 11/04/03.

Please make checks payable to Richard J. Mandel, M.D., PC (EIN #23-2956281). Please send payment to Richard J. Mandel, M.D., PC, P.O. Box 230, Flourtown, PA 19031.

Sincerely,


Barbara Rutberg
Encl

PLEASE SEND ALL CORRESPONDENCE TO: PO Box 230 • FLOURTOWN, PA 19031-0230
PHONE (215) 402-0400 • FAX (215) 402-0409

Flourtown Commons • 1811 Bethlehem Pike • Suite 214 • Flourtown, PA 19031
Medical Arts Pavilion • 2705 DeKalb Pike • Suite 307 • Norristown, PA 19401

LIBERTY MUTUAL INSURANCE
15 KINGS GRANT DRIVE
P.O. BOX 3632
BALA CYNWYD, PA 19004

HEALTH INSURANCE CLAIM FORM

1. MEDICARE (Medicare) <input type="checkbox"/> MEDICAID (Medicaid) <input type="checkbox"/> CHAMPVA (Sponsor's SSN) <input type="checkbox"/> (VA File #) <input type="checkbox"/> GROUP HEALTH PLAN (SSN or ID) <input type="checkbox"/> FECA BLK LUNG (SSN) <input checked="" type="checkbox"/> OTHER (ID) <input type="checkbox"/>		1a. INSURED'S I.D. NUMBER (FOR PROGRAM IN ITEM 1)	
2. PATIENT'S NAME (Last Name, First Name, Middle Initial) HILL, CORNELIUS		3. PATIENT'S BIRTH DATE MM DD YY 10 09 46 M <input checked="" type="checkbox"/> F <input type="checkbox"/>	
3. PATIENT'S ADDRESS (No. Street) HILL, CORNELIUS		4. INSURED'S NAME (Last Name, First Name, Middle Initial) HILL, CORNELIUS	
4. PATIENT'S RELATIONSHIP TO INSURED Self <input checked="" type="checkbox"/> Spouse <input type="checkbox"/> Child <input type="checkbox"/> Other <input type="checkbox"/>		5. INSURED'S ADDRESS (No. Street) HILL, CORNELIUS	
CITY STATE		CITY STATE	
ZIP CODE TELEPHONE (Include Area Code) ()		ZIP CODE TELEPHONE (INCLUDE AREA CODE) ()	
9. OTHER INSURED'S NAME (Last Name, First Name, Middle Initial)		10. IS PATIENT'S CONDITION RELATED TO:	
a. OTHER INSURED'S POLICY OR GROUP NUMBER		a. EMPLOYMENT? (CURRENT OR PREVIOUS) <input type="checkbox"/> YES <input type="checkbox"/> NO	
b. OTHER INSURED'S DATE OF BIRTH MM DD YY M <input type="checkbox"/> F <input type="checkbox"/>		b. AUTO ACCIDENT? <input type="checkbox"/> YES <input type="checkbox"/> NO PLACE (State)	
c. EMPLOYER'S NAME OR SCHOOL NAME		c. OTHER ACCIDENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
d. INSURANCE PLAN NAME OR PROGRAM NAME		10d. RESERVED FOR LOCAL USE	
11. INSURED'S POLICY GROUP OR FECA NUMBER			
a. INSURED'S DATE OF BIRTH MM DD YY M <input type="checkbox"/> F <input type="checkbox"/>			
b. EMPLOYER'S NAME OR SCHOOL NAME 10 20 46 X			
c. INSURANCE PLAN NAME OR PROGRAM NAME LIBERTY MUTUAL INSURANCE			
12. IS THERE ANOTHER HEALTH BENEFIT PLAN? <input type="checkbox"/> YES <input type="checkbox"/> NO If yes, return to and complete item 9 a-d.			
13. INSURED'S OR AUTHORIZED PERSON'S SIGNATURE I authorize payment of medical benefits to the undersigned physician or supplier for services described below.			
14. DATE OF CURRENT: MM DD YY ILLNESS (First symptom) OR INJURY (Accident) OR PREGNANCY (LMP)			
15. IF PATIENT HAS HAD SAME OR SIMILAR ILLNESS. GIVE FIRST DATE MM DD YY			
16. DATES PATIENT UNABLE TO WORK IN CURRENT OCCUPATION FROM MM DD YY TO MM DD YY			
17. HOSPITALIZATION DATES RELATED TO CURRENT SERVICES FROM MM DD YY TO MM DD YY			
18. OUTSIDE LAB? \$ CHARGES <input type="checkbox"/> YES <input type="checkbox"/> NO			
22. MEDICAID RE submission CODE ORIGINAL REF. NO.			
23. PRIOR AUTHORIZATION NUMBER			
24. A DATE(S) OF SERVICE B Place of Service C Type of Service D PROCEDURES, SERVICES, OR SUPPLIES (Explain Unusual Circumstances) E DIAGNOSIS CODE F \$ CHARGES G DAYS OR UNITS H EPSOT Family Plan I EMG J COB K RESERVED FOR LOCAL USE			
1 04 03 11 04 03 11 DEPO - cancelled less than 30 days 750.00 1 MANDEL			
1 04 03 11 04 03 11 IME01 - 650.00 1 MANDEL			
25. FEDERAL TAX I.D. NUMBER SSN EIN 26. PATIENT'S ACCOUNT NO. 27. ACCEPT ASSIGNMENT? (For govt. claims, see back) YES NO 28. TOTAL CHARGE \$2400.00 29. AMOUNT PAID \$2400.00 30. BALANCE DUE \$190.00			
31. SIGNATURE OF PHYSICIAN OR SUPPLIER INCLUDING DEGREES OR CREDENTIALS (I certify that the statements on the reverse apply to this bill and are made a part thereof.) SIGNATURE ON FILE 11/04/03			
32. NAME AND ADDRESS OF PARTY WHERE SERVICES WERE RENDERED (If other than home or office) RICHARD J. MANDEL, MD FLOURTOWN COMMONS FLOURTOWN, PA 19031-1111			
33. PHYSICIAN'S, SUPPLIER'S BILLING NAME, ADDRESS, & PHONE RICHARD J. MANDEL, MD PC P.O. BOX 230 FLOURTOWN, PA 19031			

RAWLE & HENDERSON LLP



THE NATION'S OLDEST LAW OFFICES
ESTABLISHED 1783

www.rawle.com

FILE COPY

CARL D. BUCHHOLZ, III
215-575-4235
cbuchholz@rawle.com

DAVID S. SANTEE
215-575-4271
dsantee@rawle.com

THE WIDENER BUILDING
ONE SOUTH PENN SQUARE
PHILADELPHIA, PA 19107

TELEPHONE: (215) 575-4200
FACSIMILE: (215) 563-2583

October 31, 2003

Richard J. Mandel, M.D.
P.O. Box 230
Flourtown, PA 19031-0230

Attn: Barbara Rutberg

Re: Cornelius Hill v. Schiffahrtsgesellschaft MS, et al.
Civil Action No. 02-CV-2713
Our File No. 435,288

Dear Ms. Rutberg:

Enclosed please find our Check No. 80346 in the amount of \$650.00 for payment of Dr. Mandel's fee for the independent medical examination of Cornelius Hill, scheduled **Tuesday, November 4, 2003.**

Thank you in advance for your attention to this matter.

Very truly yours,

RAWLE & HENDERSON LLP

By: *David S. Santee*
Carl D. Buchholz, III
David S. Santee

CDB/DSS:cct
Enclosure

RAWLE & HENDERSON <small>LLP</small>				
DATE	INVOICE NO. OR REFERENCE	AMOUNT	DISCOUNT	BALANCE
10/30/03	65000-43528IME SCHEDULED FOR 11/4/03 <u>435288</u>	650.00		650.00
DAVID S SANTEE		TOTALS	0.00	650.00

PLEASE DETACH STATEMENT BEFORE DEPOSITING CHECK

80346

Exhibit E

EXHIBIT "D"

**FEEES FOR EXEMPLIFICATION AND COPIES OF PAPERS
NECESSARILY OBTAINED FOR USE IN THE CASE**

In-house duplication

431 copies @ \$0.25 per copy

Total: \$1,724.00

Outside duplication services (see attached receipts)

Total: \$486.32

Grand Total: \$2,210.32

CONANT**Business Printing
Legal Copying
215-557-7466**

Please keep the pink copy for your records.

*"Bills/Rec"
filed**215-575-4200x3279*

Law Firm

*Rawle & Henderson*File Work Order No. *23153*

Prepared by

Anne Cove / Carl Budholz

Today's Date

3/30/04

Your Client

M/V SEA PARTNER

Date Due

3/26/04 5:47 p.

Matter No.

435,288

File No.

435288

Item Description.

No. of Sets (to be copied)

1

No. of Pages

3

Total Pages Copied

3

Please attach a list of Parties to be served.

§

Special Instructions:

*Please make the attached on
boards for exhibits for trial**(trial starts Mon. 8am)*Conant Copy Service includes: Color Copies · B&W / Color Enlargements · Foamcore Mounting · Medical Records · Transcripts
Briefs · Reproduced Records · Litigation Copying · Multi-party Mailings · Court Exhibits · Forms. All jobs Large and Small.

04 MAR 26 AM 8:

Verification of Service

Total Number of Counsel Served

Date of Service

Charges:

Copy

108.00

Bindery

Sales Tax

7.56

Postage

Total Charges

*115.56**Thank You!*

CONANT**Business Printing
Legal Copying
215-557-7466**

Please keep the pink copy for your records.

215-575 4200 x3279

Law Firm Rayne & Henderson
Prepared by Anne Case / Carl D. Buchholz
Your Client _____
Matter No. 435,288 M/V SEA PANTHERFile Work Order N^o 23152
Today's Date 3/25/04
Date Due 3/26/04
File No. 435,288

Item Description:

(Trial is on
Monday)No. of Sets (to be copied) 1 No. of Pages 1 Total Pages Copied 1

'04 MAR 25 PM 12:14

Please attach a list of Parties to be served.

Special Instructions:

Please put on large Board for

Trial exhibit.

Thanks!

AnneConant Copy Service includes: Color Copies · B&W / Color Enlargements · Foamcore Mounting · Medical Records · Transcripts
Briefs · Reproduced Records · Litigation Copying · Multi-party Mailings · Court Exhibits · Forms. All jobs Large and Small.**Verification of Service**

Total Number of Counsel Served _____

Date of Service _____

Charges:

Copy 36.00
Bindery _____
Sales Tax 2.52
Postage _____
Total Charges \$ 38.52*Thank You!*

CONANT**Business Printing****Legal Copying****215-557-7466**

FEB 26 PM 2

Please keep the pink copy for your records.

Law Firm Rawle + Henderson LLPPrepared by ANNE CAVEYour Client 215-575-4200 x3279Matter No. 435-288 Hill

Item Description:

File Work Order Nº 23148Today's Date 2/26/04Date Due 2/26/04File No. 02/27/04

AM

No. of Sets (to be copied) _____ No. of Pages _____ Total Pages Copied _____

Please attach a list of Parties to be served.

Special Instructions:

Please brow up Figure 4
 to about 4' x 5' (approx)
 (board)

Conant Copy Service includes: Color Copies · B&W / Color Enlargements · Foamcore Mounting · Medical Records · Transcripts
 Briefs · Reproduced Records · Litigation Copying · Multi-party Mailings · Court Exhibits · Forms. All jobs Large and Small.

Verification of Service

Total Number of Counsel Served _____

Date of Service _____

Charges:

Copy 238.50

Bindery _____

Sales Tax 16.70

Postage _____

Total Charges 255.2036x60 color mounted**Thank You!**

CONANT

Business Printing
Legal Copying
215-557-7466

Please keep the pink copy for your records.

Law Firm Rowle + Henderson

File Work Order N^o 23154

Prepared by Anne Cave 215-575-4200 x3279

Today's Date 4/6

Your Client _____

Date Due 4/6 ASAP

Matter No. 435,288 - SEA PANTHER

File No. 435288

Item Description:

No. of Sets (to be copied) 1 No. of Pages 2 Total Pages Copied 2

Please attach a list of Parties to be served.

Special Instructions:

*2 pages attached need to be blown up on boards
 & brought to Federal court in Room 17B / 601 Market,
 (J. Baylson). Thank! Anne*

Conant Copy Service includes: Color Copies · B&W / Color Enlargements · Foamcore Mounting · Medical Records · Transcripts
 Briefs · Reproduced Records · Litigation Copying · Multi-party Mailings · Court Exhibits · Forms. All Jobs Large and Small.

Verification of Service

Total Number of Counsel Served _____

04 APR 6 AM 8:

Date of Service _____

Charges:

Copy 72.00

Bindery _____

Sales Tax 5.61

Postage _____

Total Charges \$77.04

*Super Rush
 24x36
 Enlargements
 Thank You!*

Exhibit F


Inlingua Leaven Unlimited, Inc.

T/A inlingua School of Languages
 230 South Broad Street, 7th Floor
 Philadelphia, PA 19102
 Federal EIN 23-2446973

PH INVOICE

DATE	INVOICE NO.
5/27/2003	2-10688

BILL TO

Rawle & Henderson LLP
 Attn. Anna Cave
 The Widener Building
 One South Penn Square
 Philadelphia PA 19107

Bills/Ku
fold
SEA PANTHER
435,288

PO/Claim #	DUE DATE	REP	INL JOB #	GROUP	LEGAL COUNSEL
	6/26/2003	JB	*1TRAHE001		
ITEM	DESCRIPTION	QTY	RATE	CLASS	AMOUNT
1TL	Translation and proof-reading of German maritime document into English.	1,344	0.26	Translation	349.44

Please remit payment within 30 days of the date of this invoice. Thank You for using inlingua

Total**\$349.44**

Finance Department
 215-735-7646 ext 23

OK
349.44

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

CORNELIUS HILL

and

TRUDIE HASTINGS HILL H/W

Plaintiffs

SCHIFFFAHRTSGESELLSCHAFT MS

PRIWALL mbH & Co. KG

and

REEDEREI F. LAEISZ G.m.b.h., ROSTOCK

Defendants


NO. 02-CV-2713

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I do hereby certify that the foregoing Request for Taxation of Costs by the Clerk was served on this date by hand delivery to the following counsel of record:

E. Alfred Smith, Esquire
1333 Race Street, 2nd Floor
Philadelphia, PA 19107
Attorney for Plaintiff



David S. Santee, Esquire

Date: 6-3-04